

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☒ SUPERSEDING
OFFENSE CHARGED

21 USC Sections 846, 841(a)(1), 841(b)(1)(C)

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony
PENALTY:

See penalty sheet attachment

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. Att'y ☐ Defense

☐ this prosecution relates to a pending case involving this same defendant

☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under
SHOW
DOCKET NO.MAGISTRATE
CASE NO.

10-70336 BZ

 Name and Office of Person
 Furnishing Information on
 THIS FORM

Melinda Haag

☒ U.S. Att'y ☐ Other U.S. Agency

 Name of Asst. U.S. Att'y
 (if assigned)

Nicole M. Kim

 Name of District Court, and/or Judge/Magistrate Location
 NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

YURI LAMBERT

DISTRICT COURT NUMBER

CR 10-376 JSW

DEFENDANT**IS NOT IN CUSTODY**

- 1) ☐ Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☒ Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges } ☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of Institution

 Has detainer
 been filed?

☐ Yes
☐ No

 If "Yes"
 give date
 filed

**DATE OF
 ARREST**

Month/Day/Year

4/23/2010

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
 TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS*
☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: _____

 *Where defendant previously apprehended on complaint, no new summons
 or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____

Before Judge: _____

Comments: _____

**PENALTY SHEET ATTACHMENT:
YURI LAMBERT**

FILED
2010 AUG 26 P 3:19
RICHARD W. WILKING
CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

Count 1

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C) - Conspiracy to distribute and possess with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 2

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) - Possession with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☒ SUPERSEDING
OFFENSE CHARGED
 21 USC Sections 846, 841(a)(1), 841(b)(1)(C),
 841(b)(1)(A)(v)

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony
PENALTY:

See penalty sheet attachment

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a re prosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. Att'y ☐ Defense

☐ this prosecution relates to a pending case involving this same defendant

☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE CASE NO.

10-70336 BZ

 Name and Office of Person
 Furnishing Information on
 THIS FORM

Melinda Haag

☒ U.S. Att'y ☐ Other U.S. Agency

 Name of Asst. U.S. Att'y
 (if assigned)

Nicole M. Kim

 Name of District Court, and/or Judge/Magistrate Location
 NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

JAMES EDMONDS

DISTRICT COURT NUMBER

CR 10-376 JSW

DEFENDANT**IS NOT IN CUSTODY**
 1) ☐ Has not been arrested, pending outcome this proceeding.
 If not detained give date any prior summons was served on above charges

 2) ☐ Is a Fugitive

 3) ☒ Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY
 4) ☐ On this charge

 5) ☐ On another conviction

 6) ☐ Awaiting trial on other charges

☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

 Has detainer
 been filed?

☐ Yes
☐ No

 If "Yes"
 give date
 filed

**DATE OF
 ARREST**

 4/23/2010
 Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
 TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS*
☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: _____

 *Where defendant previously apprehended on complaint, no new summons
 or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____

Before Judge: _____

Comments: _____

**PENALTY SHEET ATTACHMENT:
JAMES EDMONDS**

FILED
2010 AUG 26 P 3:19
RICHARD W. WILKING
CLERK, U.S. DISTRICT COURT
NORTH DAKOTA DISTRICT

Count 1

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C) - Conspiracy to distribute and possess with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 2

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) - Possession with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 5

21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(v) - Possession with intent to distribute lysergic acid diethylamide (LSD), a Schedule I controlled substance.

Mandatory minimum sentence of 10 years in prison, maximum term of life imprisonment, a \$4 million fine, maximum term of supervised release of life, minimum term of supervised release of 5 years, and \$100 special assessment.

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☒ SUPERSEDING
OFFENSE CHARGED21 USC Sections 846, 841(a)(1), 841(b)(1)(C),
841(b)(1)(A)(v)

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

PENALTY:

See penalty sheet attachment

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a pending case involving this same defendant☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underSHOW
DOCKET NO.MAGISTRATE
CASE NO.

10-70336 BZ

Name and Office of Person
Furnishing Information on
THIS FORM

Melinda Haag

☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y
(if assigned)

Nicole M. Kim

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA**DEFENDANT - U.S.**

OSHAN COOK

DISTRICT COURT NUMBER

CR 10-376 JSW

DEFENDANT**IS NOT IN CUSTODY**1) ☐ Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☒ Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY4) ☐ On this charge5) ☐ On another conviction6) ☐ Awaiting trial on other charges☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

4/23/2010

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS*☐ WARRANT Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: _____

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____

Before Judge: _____

Comments: _____

**PENALTY SHEET ATTACHMENT:
OSHAN COOK**

FILED
2010 AUG 26 P 3:19
RICHARD W. REITING
CLERK OF DISTRICT COURT
NORTH DAKOTA

Count 1

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C) - Conspiracy to distribute and possess with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 2

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) - Possession with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 3

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) - Possession with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 4

21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(v) - Possession with intent to distribute lysergic acid diethylamide (LSD), a Schedule I controlled substance.

Mandatory minimum sentence of 10 years in prison, maximum term of life imprisonment, a \$4 million fine, maximum term of supervised release of life, minimum term of supervised release of 5 years, and \$100 special assessment.

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☒ SUPERSEDING
OFFENSE CHARGED

21 USC Sections 846, 841(a)(1), 841(b)(1)(C)

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony
PENALTY:

See penalty sheet attachment

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. Att'y ☐ Defense

☐ this prosecution relates to a pending case involving this same defendant

☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under
SHOW
DOCKET NO.MAGISTRATE
CASE NO.

10-70336 BZ

 Name and Office of Person
 Furnishing Information on
 THIS FORM

Melinda Haag

☒ U.S. Att'y ☐ Other U.S. Agency

 Name of Asst. U.S. Att'y
 (if assigned)

Nicole M. Kim

 Name of District Court, and/or Judge/Magistrate Location
 NORTHERN DISTRICT OF CALIFORNIA
DEFENDANT - U.S.

VICTORIA VANLAANEN

 DISTRICT COURT NUMBER
 CR 10-376 JSW
DEFENDANT**IS NOT IN CUSTODY**
 1) ☐ Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges

 2) ☐ Is a Fugitive

 3) ☒ Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY
 4) ☐ On this charge

 5) ☐ On another conviction

 6) ☐ Awaiting trial on other charges

☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

 Has detainer
 been filed?

☐ Yes
☐ No

 If "Yes"
 give date
 filed

**DATE OF
 ARREST**

Month/Day/Year

4/23/2010

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
 TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS*

☐ WARRANT Bail Amount:

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

**PENALTY SHEET ATTACHMENT:
VICTORIA VANLAANEN**

Count 1

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C) - Conspiracy to distribute and possess with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 2

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) - Possession with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

FILED
2010 AUG 26 P 3:19
RICHARD W. WIENING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED
2010 AUG 26 P 3:19
RICHARD W. FLEMING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

V.

YURI LAMBERT, et al.

DEFENDANT(S).

SUPERSEDING INDICTMENT

A true bill.

Granita L. Lewis

Deputy Foreman

Filed in open court this 26th day of

August, 2010

John J. Finkle

Clerk

Bail, \$ No answer

Sharon D. Lopez

FILED
2010 AUG 26 P 3:19
RICHARD W. WILKINS
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MELINDA HAAG (CABN 132612)
United States Attorney

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA

No. CR 10-0376 JSW

v.

YURI LAMBERT,
JAMES EDMONDS,
OSHAN COOK, and
VICTORIA VANLAANEN,

VIOLATIONS: 21 U.S.C. § 846 –
Conspiracy to Possess with Intent to
Distribute and to Distribute MDMA;
21 U.S.C. §§ 841(a)(1) & (b)(1)(C) –
Possession with Intent to Distribute MDMA;
21 U.S.C. §§ 841(a)(1) & (b)(1)(A)(v) –
Possession with Intent to Distribute LSD;
and 18 U.S.C. § 2 – Aiding and Abetting;
Criminal Forfeiture Allegation

Defendants.

SAN FRANCISCO VENUE

SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT ONE:

Beginning at a time unknown to the Grand Jury, but no later than in or around March
2010, and continuing thereafter up through and including April 22, 2010, both dates being
approximate and inclusive, in the Northern District of California and elsewhere, the defendants,

YURI LAMBERT,
JAMES EDMONDS,
OSHAN COOK, and
VICTORIA VANLAANEN,

INDICTMENT

1 and others known and unknown, knowingly and intentionally conspired to possess with intent to
2 distribute and to distribute 3,4-Methylenedioxymethamphetamine (MDMA), a Schedule I
3 controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and
4 841(b)(1)(C).

5 COUNT TWO:

6 On or about April 22, 2010, in the Northern District of California, the defendants,

7 YURI LAMBERT,
8 JAMES EDMONDS,
9 OSHAN COOK, and
VICTORIA VANLAANEN,

10 did knowingly and intentionally possess with intent to distribute
11 3,4-Methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance, in violation
12 of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States
13 Code, Section 2.

14 COUNT THREE:

15 On or about April 22, 2010, in the Northern District of California, the defendant,

16 OSHAN COOK,

17 did knowingly and intentionally possess with intent to distribute 3,4
18 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance, in violation of
19 Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States
20 Code, Section 2.

21 COUNT FOUR:

22 On or about April 22, 2010, in the Northern District of California, the defendant,

23 OSHAN COOK,

24 did knowingly and intentionally possess with intent to distribute a Schedule I controlled
25 substance, to wit: ten (10) grams or more of a mixture or substance containing a detectable
26 amount of lysergic acid diethylamide, or LSD, in violation of Title 21, United States Code,
27 Sections 841(a)(1) and 841(b)(1)(A)(v), and Title 18, United States Code, Section 2.

COUNT FIVE:

On or about April 22, 2010, in the Northern District of California, the defendant,
 JAMES EDMONDS,
 did knowingly and intentionally possess with intent to distribute a Schedule I controlled
 substance, to wit: ten (10) grams or more of a mixture or substance containing a detectable
 amount of lysergic acid diethylamide, or LSD, in violation of Title 21, United States Code,
 Sections 841(a)(1) and 841(b)(1)(A)(v), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION:

1. The factual allegations contained in Counts One, Two, Three and Four of this
 Superseding Indictment are re-alleged and fully incorporated herein for the purpose of alleging
 forfeiture pursuant to the provisions of 21 U.S.C. §§ 853(a)(1) and (a)(2).

2. Upon a conviction of any of the offenses alleged in Counts One, Two, Three and
 Four of this Superseding Indictment, the defendants,

YURI LAMBERT,
 JAMES EDMONDS,
 OSHAN COOK, and
 VICTORIA VANLAANEN,

shall forfeit to the United States all right, title, and interest in property constituting and derived
 from any proceeds defendants obtained, directly or indirectly, as a result of said violations, and
 any property used, or intended to be used, in any manner or part, to commit or to facilitate the
 commission of the said violations.

3. If, as a result of any act or omission of the defendants, any of said property

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without
 difficulty;

any and all interest defendants have in any other property (not to exceed the value of the above
 forfeitable property) shall be vested in the United States and forfeited to the United States.

1 All in violation of Title 21, United States Code, Section 853(a)(1), (a)(2), (p) and Rule
2 32.2 of the Federal Rules of Criminal Procedure.

3
4 DATED: 8/26/10

A TRUE BILL.

5
6 Deputy Granita Riser
FOREPERSON

7
8 MELINDA HAAG
United States Attorney

9 Brian J. Stretch
10 BRIAN J. STRETCH
11 Chief, Criminal Division

12 (Approved as to form: Nicole M. Kim)
13 AUSA NICOLE M. KIM
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28